

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>TAMI LYN SINGLETARY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO.: 2:07-cv-840-MEF</b>
	)	
<b>JEROME LEE CANTRELL,</b>	)	
<b>SPACE FLOORING &amp; SUPPLIES, INC.</b>	)	
<b>STATE FARM MUTUAL</b>	)	
<b>AUTOMOBILE INSURANCE</b>	)	
<b>COMPANY; and FICTITIOUS</b>	)	
<b>DEFENDANTS A, B and C, being</b>	)	
<b>those persons, corporations,</b>	)	
<b>partnerships, or other legal entities</b>	)	
<b>whose identities are unknown to the</b>	)	
<b>Plaintiff at this time,</b>	)	
	)	
<b>Defendants.</b>	)	

**PROPOSED DISCOVERY PLAN**

Pursuant to Fed.R.Civ.P. 26(f), Joel W. Ramsey, counsel for the Defendant State Farm Insurance Company; Adam Jones, counsel for the Plaintiff; and Clifton E. Slaten, counsel for Defendants Space Flooring & Supplies, Inc. and Jerome Lee Cantrell agree on the following proposed discovery plan:

**1. PRE-DISCOVERY DISCLOSURES.**

The parties will make their Rule 26(a)(1) initial disclosures within fourteen (14) days from January 10, 2007.

**2. DISCOVERY PLAN**

The parties jointly propose to the Court the following discovery plan:

A. Discovery will be needed on the Plaintiff's claims and the Defendants' defenses.

B. All discovery shall be commenced in time to be completed by June 6, 2008.

C. A maximum of fifty (50) interrogatories by each party to any other party. Unless otherwise agreed between the parties, responses are due within thirty (30) days of service.

D. A Maximum of thirty-five (35) request for admissions by each party to any other party. Unless otherwise agreed between the parties, responses are due within thirty (30) days of service.

E. A maximum of twenty-five (25) request for production of documents by each party to any other party. Unless otherwise agreed between the parties, responses are due within thirty (30) days of service.

F. A maximum of ten (10) depositions by Plaintiff and ten (10) depositions by the Defendant.

G. Reports from retained experts under Rule 26(a)(2) shall be due:

From Plaintiff by April 7, 2008.

From Defendants by May 7, 2008.

H. Supplementations under Rule 26(e) are due within thirty (30) days of identification.

### 3. OTHER ITEMS.

A. The parties do not request a conference with the Court before entry of the scheduling order.

B. The parties request a pretrial conference in June of 2008.

C. Plaintiff should be allowed until March 3, 2008 to join additional parties and March 17, 2008 to amend pleadings.

D. Defendants should be allowed until April 3, 2008 to join additional parties and April 17, 2008 to amend pleadings.

E. All potentially dispositive motions should be filed no later than ninety (90) days prior to the pretrial hearing.

F. Settlement cannot be evaluated prior to the close of discovery.

G. Final lists of witnesses and exhibits shall be due thirty (30) days before trial.

H. Parties shall have fifteen (15) days after service of final lists of witnesses and exhibits to list objections.

I. The case should be ready for trial by July 7, 2008 and is expected to take approximately two days.

Dated this the 10<sup>th</sup> day of January, 2008.

/s/ M. ADAM JONES  
Attorney for the Plaintiff  
JACOBY & MEYERS, LLC  
P.O. Box 5551  
Dothan, AL 36302  
Tel: 334-794-8000  
Adam.Jones@JacobyMeyers.com

/s/ JOEL W. RAMSEY  
Attorney for Defendant State Farm Ins. Co.  
RAMSEY, BAXLEY & MCDOUGLE  
P.O. Drawer 1486  
Dothan, AL 36302  
Tel: 334-793-6550  
jwr@rbmlaw.com

/s/ Clifton E. Slaten  
SLATEN & O'CONNOR, P.C.  
Attorney for Space Flooring and Supplies, Inc. and  
Jerome Lee Cantrell  
Winter Loeb Building  
105 Tallapoosa Street  
Suite 101  
Montgomery, Alabama 36104  
Tel: 334-396-8882